

Becker, Dale

From: Kim Singleton <Kim@LRAPA.ORG>
Sent: Thursday, May 19, 2016 9:26 AM
To: Becker, Dale
Subject: Updated Edenvale staff report
Attachments: NON 3627_Goodell_staff report.docx

Follow Up Flag: Follow up
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Hi Dale, you have probably moved on to the next cleanup by now, but I thought I'd send you an updated version of my staff report for the 85961 Edenvale incident just in case. I've had a number of asbestos-related incidents in the meantime, so it took me a little while to return to this document. I enjoyed working with you and your crew and hope your future projects run smoothly!

Take care,

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May 19, 2016

To: MLH
From: KS

Subject: Notice of Non-Compliance (NON) 3627 Gordon Goodell

On April 25, 2016, at 1143 hours, LRAPA received an anonymous complaint regarding the demolition of a mobile home located in space #31 of the Bella Casa manufactured home park at 85961 Edenvale Road in Pleasant Hill. The complainant was concerned that the home was being demolished without an asbestos survey. KE and CW investigated the complaint on the same day and were presented with a survey indicating the absence of asbestos in the demolition debris.

On April 28, at approximately 1720 hours, LRAPA received a phone call from Chad Ficek, Lane County Waste Management, notifying the agency that a load of demolition debris originating from a burned mobile home had been transported to the Lane County Short Mountain Landfill and he was concerned about the associated survey. The survey listed Lodge Environmental Inc. as the accredited asbestos inspector and company performing/compiling the report. LRAPA discussed the survey report with staff from Lodge, and it was determined that the survey presented to LRAPA and Lane County staff had been altered from the original report. The original report compiled by Lodge indicated the presence of 5% chrysotile asbestos in the window putty and 8% chrysotile asbestos in the paint on the roof. The altered report presented to LRAPA staff on April 25 and Lane County staff on April 28 indicated an absence of asbestos in all sampled materials. Lane County staff turned away the hauler of the demolition debris, (b) (6), on April 28. Lodge provided LRAPA with the full report and estimate for abatement for the mobile home.

At 0830 hours on April 29 Colleen Wagstaff, Katie Eagleson, and I inspected the demolition site at space #31 at 85961 Edenvale Road. The mobile home was partially dismantled, with components of the roofing and widows still present and other materials strewn about in a disorganized manner. No demolition staff was present onsite at the time. A neighbor at (b) (6) provided us with the name of the original owner of the mobile home, (b) (6), and his contact information. Mr. (b) (6) had relocated to a fifth wheel trailer in (b) (6) in the mobile home park. We collected 9 samples at the demolition site for laboratory analysis. NW Hazmat analyzed the samples; results indicated the presence of asbestos in each of two samples of roofing material (5% and 3%), as well as each of two samples of window putty (30% and 25%). One sample of each materials found to be positive for asbestos was sent out by NW Hazmat for TEM analysis.

We were approached onsite by the Bella Casa mobile home park manager, (b) (6). She confirmed that (b) (6) was the original owner of the mobile home at Space #31 and explained that the unit burned down when the wood stove started a fire on the inside. She explained that Gordon Goodell had a contract with (b) (6) to demolish and dispose of the burned mobile home. She claimed that Mr. Goodell had managed the demolition project at Space #31, with other parties physically performing the demolition and hauling debris, and that she and other residents were concerned about the demolition process and associated health effects, as several residents in the vicinity have respiratory issues.

We then visited (b) (6) at his new location at (b) (6). Another resident, named (b) (6), resided with him in the unit. We requested a copy of the contract between (b) (6) and Mr. Goodell, along

with the original asbestos survey. (b) (6) was unable to locate the contract for the mobile home demolition; he claimed that the manager, (b) (6), had a copy. He did offer some contact information related to the business owned by Mr. Goodell.

At 1005 hours on April 29 Ms. Wagstaff, Ms. Eagleson, and I visited another mobile home owned by Mr. Goodell which was awaiting abatement. The home, located at (b) (6) in the Riverwood Mobile Home Park, (b) (6) in Creswell, appeared to be intact. No efforts to demolish the home were apparent.

At 1100 hours on April 29 Ms. Wagstaff Ms. Eagleson, and I visited the Lane County Transfer Station to discuss the incident with Don Strunk, supervisor of the Waste Management Division at Lane County. Mr. Strunk provided LRAPA with photographs of the altered survey that the hauler for Mr. Goodell had presented at the landfill gate on April 28 as the hauler attempted to dispose of the demolition debris as conventional waste. Mr. Strunk explained that the hauler was (b) (6), and that (b) (6) had been operating throughout the demolition process with the mistaken knowledge that the demolition debris had been negative for asbestos. Mr. Goodell had provided him with an altered survey, listing all materials as negative for asbestos. With this knowledge, (b) (6) had proceeded with the demolition, with his children assisting him, without implementing the required asbestos removal practices and procedures to protect himself and those around him. Mr. Strunk explained that, due to the fact that Mr. Goodell was fully aware that he was breaking the law, this should be a criminal investigation. Mr. Strunk provided us with the home address of (b) (6) Latham Road, Cottage Grove.

At 1105 hours on April 29 I called (b) (6) to discuss his involvement in the demolition and hauling of debris from the contaminated site. He confirmed that he had no knowledge of the presence of asbestos in the materials and asked what should be done with his truck, which he claimed was filled with demolition debris originating from the mobile home, including windows and roofing material. I explained that these materials must be contained in the truck and properly abated through a licensed asbestos abatement contractor. He agreed to allow us on his property to inspect his truck.

At 1121 hours on April 29 Ms. (b) (6) called and requested a copy of the original asbestos survey for the demolition site at Space #31. I emailed her a copy on the same day. She also said that she suspected (b) (6) had delivered loads of demolition debris to transfer sites in Cottage Grove and Glenwood; I called LC staff, who explained they had no record of this. (b) (6) also left a voice message claiming that Mr. Goodell suggested he falsified the asbestos survey; I have saved this voicemail.

At 1135 hours on April 29 we arrived at the home of (b) (6) Latham Road in Cottage Grove. We spoke with (b) (6) onsite. He claimed to be very upset that he and his children were unknowingly exposed to asbestos during the demolition process. He also was upset that he unknowingly acquired a truckload of contaminated building debris that will require abatement and will prevent him from using his truck, upon which he depends for income. We confirmed that roofing material was present in the truck and explained that materials should be wetted and contained until an abatement company can properly remove them. (b) (6) admitted that he took three loads of demolition debris to the Rattlesnake Road transfer station. He also alleged that a portion of the metal materials from the demolition site were hauled away from a gentleman he had sourced from Craigslist, (b) (6). He presumed that (b) (6) had taken the metal to Schnitzer's Steel.

At 1215 hours on April 29 we visited (b) (6) at the Riverwood Mobile Home Park, as this location was listed in the asbestos survey Mr. Goodell had used to alter his survey for the Edenvale Rd. site. The mobile home in (b) (6) appeared to be relatively new; a woman inside the unit confirmed that the old unit had been removed and the unit in which she resides is new.

At 1229 hours on April 29 I called Don Strunk with LC and informed him that (b) (6) had dumped 3 loads at the Rattlesnake Road transfer station. Mr. Strunk said that the trailer receiving the debris at that transfer station may not have been dumped into the larger landfill and that he would attempt to intercept it prior to dumping.

At 1245 hours on April 29 we returned to the demolition site at Space #31 at 85961 Edenvale Rd. Mike Amelung (Pacific Environmental Group) and Mr. Goodell were present onsite. Ms. Wagstaff discussed details of the proposed abatement with Mr. Amelung while Ms. Eagleson and I discussed the incident with Mr. Goodell. We offered Mr. Goodell a copy of Title 43 and explained the requirements as they relate to this demolition project, including surveys, asbestos work practices and procedures, and disposal requirements. We also explained that, in contrast to information the survey that was presented to LRAPA staff on April 25, samples analyzed by LRAPA indicated the presence of asbestos in at least two separate materials in the demolition site. We requested a copy of the survey and the contract for the work. Mr. Goodell explained that he understood the requirements but did not have a copy of either the survey or the contract. We advised him to provide a copy of both of these documents by the end of the day and also advised him to initiate abatement, through the use of a licensed asbestos contractor, of the demolition site, (b) (6) truck, and the contaminated trailer from the Lane County transfer site. Mr. Goodell faxed a copy of the original (true) survey from Lodge later on April 29 but did not include the contract. Mr. Goodell said he understood and would fax the documents on the same day and begin proper abatement as soon as possible. He also explained that he planned to rent out (b) (6) in the Riverwood Mobile Home Park, unless abatement was affordable. Mr. Amelung proposed to remove roofing, windows, debris, and exposed wooden areas of the floor. He also proposed to wipe down vinyl areas of the floor and clean debris from the ground surrounding the demolished home.

At approximately 1500 hours on April 29 I discussed the transfer of demolition debris to LC with Jeff Bishop, Waste Management Superintendent. He confirmed that LC was able to isolate the trailer receiving contaminated debris from (b) (6) loads. He promised to hold this trailer aside until proper abatement could take place.

At approximately 1550 hours on April 29 I called Eric Martenson with EPA to discuss details of the incident.

At 0703 hours on May 2 (b) (6) left a message explaining that Mr. Goodell plans to not pay for abatement of the demolition site, as he cannot afford the abatement cost.

At 0835 hours on May 2 I spoke with Mr. Goodell over the phone. He admitted that he had falsified the original asbestos survey to reduce his costs for demolition and disposal of the mobile home. He also claimed to have no money to hire a licensed abatement company to properly remove and dispose of contaminated materials, nor did he claim to have assets available to sell to acquire the necessary funding. I explained that the demolition site at Space #31, (b) (6) truck, and the Rattlesnake Road transfer site dumpster must be abated—but in the meantime they must be wetted and contained to

prevent additional exposure to those the vicinity. I advised him to wet and contain the the demolition site and (b) (6) truck by the end of the day. He agreed to contain these contaminated materials.

At 0900 hours on May 2 (b) (6) called me to discuss options for removing contaminated materials from his truck, as he claimed to require the use of his truck to conduct his business and earn his income. He requested to transfer the contaminated debris in his truck back to the demolition site at Space #31 in the Bella Casa mobile home park. I explained that as it has been confirmed that the associated debris is contaminated with asbestos, LRAPA rules require that the material remain in place, undisturbed, until a licensed abatement contractor removes and disposes of them. I also advised him to wet and cover the materials until abatement occurs. He claimed that PEG had visited his home and had covered the materials with plastic sheeting.

At 0919 hours on May 2 I called (b) (6) to discuss her concerns. She also is very concerned for the health of the occupants of her mobile home park. She claimed to have a copy of the contract between (b) (6) and Mr. Goodell. She emailed me a copy of this contract at 0939 hours on the same day.

At approximately 1100 hours on May 2 I called Keith Hendrix with the Lane County Landfill to discuss the contaminated trailer at the Rattlesnake Road transfer station. He explained that the 53-foot long trailer is contained and parked at the landfill until abatement can take place. I explained that (b) (6) may not have the required money to fund the abatement of the trailer. Mr. Hendrix said he would ensure the trailer is contained and would notify LRAPA before abatement takes place so photographs may be taken for documentation. Mr. Hendrix called back at 12135 hours on the same day to state his preference for using the same abatement company for all three locations (demolition site, (b) (6) truck, and the LC trailer). I concurred but explained that it there may be a delay before the other two site are funded for abatement.

At 1213 hours I called and left a message with (b) (6) to inquire about his involvement with the demolition site. I informed him that several materials from the site contained asbestos, and materials sourced from the area must be contained and property abated.

At 14:50 hours on May 2 Ms. Eagleson and I reinspected the materials in (b) (6) truck at his home in Cottage Grove. The load was mostly contained within plastic sheeting, although a moderately small area one side of the truck was not contained in plastic. Ms. Eagleson and I advised that he cover the remaining debris with sheeting until abatement occurs. (b) (6) communicated that he was unhappy that the abatement costs for his truck would fall upon him, as Mr. Goodell claimed to not have funding to hire an abatement contractor.

At 1520 hours on May 3 Ms. Eagleson and I reinspected the demolition site at Space #31 in the Bella Casa mobile home park. The site had not been covered/contained in any way. We posted the perimeter of the mobile home with asbestos tape.

At 0850 hours on May 3 (b) (6) called to inform me that the demolition site at Space #31 had not been covered by Mr. Goodell. She also claimed to have been watering it occasionally to prevent asbestos fibers from becoming airborne.

At 1435 hours on May 3 I called Keith Hendrix with the Lane County Landfill. He explained that LC does maintain records of the addresses of the source of asbestos related debris; he said that they do not maintain records of conventional trash.

At 14:48 hours on May 3 Calvin Terada, Chief of Emergency Response Units for EPA Region 10, called to inform me that EPA emergency response teams will mobilize the following morning to clean up the contaminated site(s).

At 15:51 hours on May 3 Dale Becker, EPA On-site Coordinator assigned to the Edenvale incident, called to explain the tentative plan for the cleanup and requested LRAPA send documentation related to the incident. I emailed LRAPA PLM and TEM tests, along with photographs of the incident and an earlier version of the staff report.

In the morning of May 4 I called Keith Hendrix, [REDACTED], and several concerned Bella Casa mobile home park residents to explain the EPA's plan to conduct the cleanup.

At 9:43 hours on May 4 I called [REDACTED], at the request of Dale Becker, in an attempt to obtain contact information for the owner of Bella Casa mobile home park. She referred me to Michael Gabris, manager of both Bella Casa and Riverwood mobile home parks. I called him directly afterward to request this information; he referred me to the head secretary for the owners, Debbie. I called Debbie directly afterward; she said that she would have the owners call Dale Becker.

At the request of Jay Bozievich, I called Devon Ashbridge, PIO for Lane County and described the cleanup plan at Edenvale Rd. Robbye Lanier called Jason Davis, PIO for Public Health with LC, and provided the same information.

At approximately 11:45 on May 4 Dale Becker arrived at the LRAPA office. He explained that his crew members were mobilizing directly to the Bella Casa mobile home park and described his strategy for abatement. LRAPA employees described our observations of the three contaminated sites. Colleen Wagstaff, Katie Eagleson, and I accompanied Mr. Becker and EPA contractor, Erin, to the contaminated sites and provided background information.

On May 5, I ordered a Point Count 400 laboratory sample analysis of window putty and roofing materials from the demolition site from NW Hazmat; samples were found to be positive for asbestos (5.25% chrysotile for the window putty and 7.75% chrysotile for the roofing material).

Later on May 5 I called Jason Davis to request a representative of Lane County Health Department be present for community meeting at the Bella Casa mobile home park; Mr. Davis explained that he wasn't able to find anyone on short notice but he did review the ATSDR fact sheet provided by Mr. Becker and confirmed the information was accurate. Mr. Davis suggested that the park occupants call the general LC Health Department number listed on the webpage if they have questions related to asbestos contamination.

At approximately 15:30 on May 5 I arrived at the Edenvale demolition site and observed the site had been partially covered in plastic sheeting. EPA crews were preparing to abate the site but were waiting for dumpsters to arrive for the debris. Air sampling equipment was set up near the demolition site and south of the demolition site near the EPA trailer.

At 9:00 on May 6 Mr. Becker, Mr. Hough, and I presented information related to asbestos contamination in Space #31 and proposed abatement activities to community members in the Bella Casa mobile home park. Members asked questions related to their health and were provided with tips for protecting

themselves, an ATSDR asbestos handout, and contact information for the Lane County Department of Health. LRAPA and the EPA also provided contact information so community members could call at a later time with questions.

At approximately 10:00 on May 6 I arrived at the Edenvale demolition site and observed a crew from Cascade Insulation Inc. actively abating debris in Space #31. Alan Reed was the competent person onsite for the abatement crew. All worker and supervisor cards were current. No visible emissions were observed. Abatement activities were in compliance with LRAPA Title 43 required work practices and procedures. All demolition debris was loaded into poly-lined dumpster trailers for later transport to a CERCLA-certified landfill in Hillsboro. Air sampling equipment was installed outdoors at both neighboring mobile home units (to the north and south) and also near the EPA trailer by the clubhouse.

At 12:50 on May 6 I called Micah Wren from Lodge Environmental to discuss a typo related to the sampling date on the original asbestos survey conducted by Lodge. He acknowledged the typo and promised to send an updated version. I received this version and emailed it, along with the correction letter, to Mr. Becker.

At 13:30 on May 6 I observed abatement of the Lane County transfer station trailer at the Short Mountain Landfill designated asbestos disposal area. Cascade Insulation crews coordinated with Lane County staff to "walk off" the demolition debris from the trailer onto a bed of poly sheeting. Debris was wetted, deposited onto the sheeting, and encapsulated in poly until it was buried in place at a later time. No visible emissions were observed. Abatement activities were in compliance with LRAPA Title 43 required work practices and procedures.

At 15:00 on May 9 I observed abatement of (b) (6) truck by Cascade Insulation crews. The removal of debris from (b) (6) truck bed was almost complete during the time of my visit. No visible emissions were observed. Abatement activities were in compliance with LRAPA Title 43 required work practices and procedures. All demolition debris was loaded into a poly-lined dumpster trailer for later transport to a CERCLA-certified landfill in Hillsboro.

At approximately 7:30 on May 10 Merlyn Hough and I attended a debriefing meeting with Mr. Becker to discuss the abatement of the three contaminated sites, answer outstanding questions for Mr. Becker, and discuss how the criminal investigation will continue after the cleanup is complete. Mr. Becker requested that I send him two emails (which I sent later on May 10): one further explaining the sampling/testing efforts conducted by LRAPA and another describing how LRAPA treats non-ACM debris at demolition sites that has been contaminated with ACM. Abatement at the three sites was essentially complete, with a pile of scraped soil awaiting disposal and transport to the CERCLA certified disposal site in the Hillsboro Landfill, 3205 SE Minter Bridge 1. After discussing LRAPA's practice of abating/hauling/disposing all cross-contaminated debris as ACM, EPA agreed to handle the demolition debris from the Edenvale site and (b) (6) truck in a similar manner. At the Edenvale demolition site, the mobile home structure was completely removed, with a layer of soil scraped to ensure fibers surrounding the original structure were removed to the greatest extent practicable. EPA also offered to HEPA vac the porch areas of neighboring mobile homes to alleviate concerns. Criminal investigations will continue through Craig Ball (Oregon State Police).

At 7:40 on May 10 I observed Space #31 at the Bella Casa mobile home park. Abatement was almost complete. The entire mobile home structure had been removed, and a thin layer of soil had been

scraped from the site in order to capture residual fibers. A small pile of scraped soil remained onsite, awaiting removal and disposal.

On May 10 Don Struck with Lane County called to inform me that LC accepted household hazardous waste from the demolition site. I explained the progress of the cleanup.